

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,	)	
	)	<b>Adv. Pro. No. 08-1789 (CGM)</b>
Plaintiff-Applicant,	)	
v.	)	<b>SIPA Liquidation</b>
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,	)	<b>(Substantively Consolidated)</b>
	)	
Defendant.	)	
In re:	)	
	)	
BERNARD L. MADOFF,	)	
	)	
Debtor.	)	
	)	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	)	
	)	<b>Adv. Pro. No. 10-04285 (CGM)</b>
Plaintiff,	)	
	)	
v.	)	
	)	
UBS AG, UBS EUROPE SE (f/k/a UBS (LUXEMBOURG) SA), UBS FUND SERVICES (LUXEMBOURG) SA, UBS THIRD PARTY MANAGEMENT COMPANY SA, ACCESS INTERNATIONAL ADVISORS LLC, ACCESS INTERNATIONAL ADVISORS LTD., ACCESS MANAGEMENT LUXEMBOURG SA (f/k/a ACCESS INTERNATIONAL ADVISORS (LUXEMBOURG) SA) as represented by its Liquidator MAÎTRE FERNAND ENTRINGER, ACCESS PARTNERS SA as represented by its Liquidator MAÎTRE FERNAND ENTRINGER, PATRICK LITTAYE, CLAUDINE MAGON DE LA VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) in her capacity as Executrix under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), CLAUDINE MAGON DE LA VILLEHUCHET (a/k/a CLAUDINE DE LA VILLEHUCHET) individually as the sole beneficiary under the Will of THIERRY MAGON DE LA	)	

VILLEHUCHET (a/k/a RENE THIERRY DE LA  
VILLEHUCHET), PIERRE DELANDMETER,  
THEODORE DUMBAULD, LUXALPHA SICAV as  
represented by its Liquidators MAÎTRE ALAIN  
RUKAVINA and PAUL LAPLUME, MAÎTRE  
ALAIN RUKAVINA AND PAUL LAPLUME, in  
their capacities as liquidators and representatives of  
LUXALPHA, GROUPEMENT FINANCIER LTD.,  
  
Defendants.

## DECLARATION OF BRIAN L. MULDREW

I, Brian L. Muldrew, declare as follows under penalty of perjury:

1. I am an attorney and partner in the law firm Katten Muchin Rosenman LLP (“**Katten**”).
2. I respectfully submit this declaration in support of Katten’s Motion to Withdraw as Counsel for Access Defendants pursuant to Local Bankruptcy Rule 2090-1(e), and to set forth service of the relevant motion papers.
3. On September 25, 2023, I served copies of the following papers:
  - Katten’s Motion to Withdraw as Counsel for Access Defendants Pursuant to Local Bankruptcy Rule 2090-1(e);
  - Declaration of Anthony L. Paccione in Support of Katten’s Motion to Withdraw As Counsel for Access Defendants Pursuant to Local Bankruptcy Rule 2090-1(e);
  - Proposed Order Granting Motion to Withdraw as Counsel for Access Defendants Pursuant to Local Bankruptcy Rule 2090-1(e); and
  - Notice of Presentment of Proposed Order Granting Katten’s Motion to Withdraw as Counsel for Access Defendants Pursuant to Local Bankruptcy Rule 2090-1(e) (collectively, the “**Motion to Withdraw**”);

via email delivery on the following counsel of record:

- Baker & Hostetler LLP, c/o Oren J. Warshavsky. Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff;

- Gibson, Dunn & Crutcher LLP, c/o Marshall R. King. Attorneys for Defendants UBS AG, UBS Europe SE(f/k/a UBS (Luxembourg) S.A.), UBS Fund Services (Luxembourg) S.A., UBS Third Party Management Company S.A.,;
- Sher Tremonte LLP, c/o Robert Knuts. Attorneys for Defendant Theodore Dumbauld;
- Porzio Bromberg & Newman P.C. c/o Brett S. Moore. Attorneys for Defendant Luxalpha SICAV as represented by its Liquidators Maître Alain Rukavina and Paul Laplume, Maître Alain Rukavina and Paul Laplume, in their capacities as liquidators and representatives of Luxalpha SICAV; and
- Friedman Kaplan Seiler & Adelman LLP, c/o Scott M. Berman. Attorneys for Defendant Pierre Delandmeter.

4. On the same day, I caused to be served true and correct copies of the Motion to Withdraw upon Patrick Littaye; Access International Advisors, LLC; Access International Advisors, Ltd.; Groupement Financier Ltd.; Access Management Luxembourg SA; and Access Partners SA via email, care of the following individuals:

- Patrick Littaye (Individually);
- Access International Advisors, LLC  
c/o Patrick Littaye (as Director of Access International Advisors Inc. (Sole Member of Access International Advisors LLC));
- Access International Advisors, Ltd.  
c/o Patrick Littaye (Director);
- Groupement Financier Ltd.  
c/o Patrick Littaye (Director);
- Access Management Luxembourg SA  
c/o Fernand Entringer (Liquidator); and
- Access Partners SA  
c/o Fernand Entringer (Liquidator).

5. On the same day I served additional true and correct copies of the Motion to Withdraw via email delivery on the following:

- Patrick Littaye; Access International Advisors, LLC; Access International Advisors, Ltd.; Access Management Luxembourg SA; Access Partners SA;

Groupement Financier Ltd., c/o Yards-Avocats (Dorothée Traverse, Hélène Moissand-Florand and Margaux Guisard) - European counsel.

6. On September 25, 2023, I caused to be served true and correct copies of the Motion to Withdraw on all parties of record via the Court's ECF system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 25, 2023  
New York, New York

  
Brian L. Muldrew

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